IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

DOLORES RAMNATH : Case No. 22-00520

DEBTOR, :

WELLS FARGO BANK :

:

Movant : Chapter 13

 $\mathbf{V}\mathbf{s}$. :

DOLORES RAMNATH, :

Respondents :

ANSWER TO MOTION FOR RELIEF OF THE AUTOMATIC STAY BY WELLS FARGO BANK

AND NOW, comes Respondent, Randy L. Roessler, by and through his attorney, Gregory S. Hazlett, Esquire, and answers this Motion for Relief from Automatic Stay:

- 1. ADMITTED
- 2. ADMITTED.
- 3. ADMITTED
- 4. ADMITTED
- 5. ADMITTED
- 6. ADMITTED
- **7. DENIED:** THE DEBTOR LACKS INFORMATION TO CONFIRM OR DENY THE ALLEGATIONS.
- 8. ADMITTED:
- 9. ADMITTED:
- 10. ADMITTED:
- 11. ADMITTED:

12. DENIED: Counsel for the debtor is unable to verify the extent if any, to which the

debtor is in arrears.

13. DENIED: Counsel for the debtor is unable to verify the extent if any, to which the

debtor is in arrears.

14. DENIED: Counsel for the debtor is unable to verify the extent if any, to which the

debtor is in arrears.

15. DENIED:

16. DENIED:

WHEREFORE, the debtor respectfully requests that the Honorable Court deny the movant's Motion for Relief from the Automatic Stay and deny movants' request to seek a waiver from rule 4001(a)(3) for the aforementioned reasons.

2/27/2024

Respectfully submitted,

s/s Gregory S. Hazlett, Esq. Gregory S. Hazlett, Esquire 7 West Main Street Mechanicsburg, PA. 17055

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